

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

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| In re: |) | |
| |) | |
| CIRCUIT CITY STORES, INC., et al., |) | Case No.: 08-35653-KRH |
| Debtors. |) | Chapter 11 |

**SUPPLEMENTAL VERIFIED STATEMENT OF ATTORNEYS FOR
CREDITORS PURSUANT TO *FEDERAL RULE OF BANKRUPTCY PROCEDURE* 2019**

COME NOW William A. Gray, Esquire; C. Thomas Ebel, Esquire; Peter M. Pearl, Esquire; and William Ashley Burgess, Esquire; and the law firm of Sands, Anderson, Marks & Miller, P.C. ("Sands Anderson"), as counsel for the parties in interest and/or creditors listed on **EXHIBIT A** attached hereto and incorporated herein by reference (collectively, the "Current Clients"), and now counsel for additional parties in interest and/or creditors identified herein, asserting claims against Circuit City Stores., *et al.*, and certain of its affiliated Debtors (collectively, the "Debtors"), and make the following verified statement pursuant to *Federal Rule of Bankruptcy Procedure* 2019.

William A. Gray, Esquire – VSB #46911
W. Ashley Burgess, Esquire – VSB # 67998
C. Thomas Ebel, Esquire – VSB #18637
Peter M. Pearl, Esquire – VSB #22344
Sands, Anderson, Marks & Miller, P.C.
801 East Main Street, Suite 1800
Post Office Box 1998
Richmond, Virginia 23218-1998
(804) 648-1636 Telephone
(804) 783-7291 Facsimile

Counsel for: Reverend Dwayne Funches, individually, and as Independent Executor of the Estates of Travis Funches, Dione Funches, and Dwayne Funches, Jr., Emily Funches, Lovera S. Funches, and Shatira Funches, individually; Cynthia Olloway, Individually and as a Special Administrator of the Estate of Cedric Coy Langston, Jr., a Deceased Minor; Monument Consulting, LLC; McAlister Square Partners, Ltd; Mansfield SEQ 287 and Debbie, Ltd.; UTC I, LLC; PrattCenter, LLC; Valley Corners Shopping Center, LLC; Encinitas PFA, LLC; Cardinal Court, LLC; Phyllis M. Pearson; T.J.Maxx of CA, LLC; Baker Natick Promenade LLC; BPP-Conn LLC, f/k/a WEC 95B Manchester Limited Partnership; BPP-Muncy, LLC; BPP-NY LLC; BPP-OH LLC; BPP-Redding LLC; BPP-SC LLC; The Stop & Shop Supermarket Company; BPP-VA, LLC; BPP-WB LLC; Colonial Heights Holdings, LLC; E&A Northeast Limited Partnership; Ray Mucci's, Inc.; Interstate Augusta, LLC; NPP Development, LLC; Route 146 Millbury, LLC; Alexander's of Rego Park Center, Inc.; Amherst VF LLC; BevCon I, LLC; Vornado Caguas LP; East Brunswick VF LLC; Green Acres Mall, LLC; Vornado Gun Hill Road LLC; Marlton VF, LLC; North Bergen Tonnelle Plaza, LLC; North Plainfield VF, LLC; Wayne VF LLC a/k/a Star Universal ;Towson VF LLC; VNO Mundy Street LLC; VNO Tru Dale Mabry, LLC; Christopher Borglin; Paul Schaapman; CSI Construction Company; Hilton Ellis Epps, Sr.; Chatham County, Georgia Tax Commissioner; DEV Limited Partnership; Kelly Breitenbecher; A.D.D. Holdings, L.P.; Hillson Electric Incorporated; John Rohrer Contracting Company, Inc.; Lang Construction, Inc.; and Rebecca Hylton DeCamps, Denon Electronics, Snell Acoustics, Inc., Mid-American Insulation, Inc., Midwest Block & Brick, Inc., McCorkendale Construction, Premier Contracting, Inc., Lee County, Mississippi Tax Collector, and DeSoto County, Mississippi.

1. Sands Anderson's Current Clients' names are set forth on **EXHIBIT A** attached hereto and incorporated herein by reference. Prior statements pursuant to *Federal Rules of Bankruptcy Procedure* 2019 ("2019 Statements") have been filed pertaining to the Current Clients. Sands Anderson hereby supplements the previous 2019 Statements.

2. Sands Anderson has now been retained by additional creditors, whose names, addresses and a brief explanation of the interests are as follows (collectively, "New Clients"):

- a. Denon Electronics (USA), LLC
c/o John Henderson
100 Corporate Drive
Mahwah, New Jersey, 07430
Nature of Interest: Rights and remedies in connection with reclamation claim and other amounts owed by Circuit City for sale of goods to Debtor in Debtor's ordinary course of business. All claims or rights arose by virtue of the client's contractual, statutory, and/or common law rights with or against one or more of the Debtors.
- b. Snell Acoustics, Inc.
c/o John Henderson
100 Corporate Drive
Mahway, New Jersey 07430
Nature of Interest: Rights and remedies in connection with reclamation claim and other amounts owed by Circuit City for sale of goods to Debtor in Debtor's ordinary course of business. All claims or rights arose by virtue of the client's contractual, statutory, and/or common law rights with or against one or more of the Debtors.
- c. Mid-American Insulation, Inc.
c/o Tyler Peters
Payne & Jones, Chartered
11000 King Street
P.O. Box 25625
Overland Park, Kansas 66225-5626
Nature of Interest: Mechanics' lien claimant on property formally leased by Debtor, and Motion for Relief From Stay to pursue State Court mechanics' lien litigation. All claims or rights arose by virtue of the client's contractual, statutory, and/or common law rights with or against one or more of the Debtors.

- d. Midwest Block & Brick
c/o Tyler Peters
Payne & Jones, Chartered
11000 King Street
P.O. Box 25625
Overland Park, Kansas 66225-5626
Nature of Interest: Mechanics' lien claimant on property formally leased by Debtor, and Motion for Relief From Stay to pursue State Court mechanics' lien litigation. All claims or rights arose by virtue of the client's contractual, statutory, and/or common law rights with or against one or more of the Debtors.
- e. McCorkendale Construction
c/o Tyler Peters
Payne & Jones, Chartered
11000 King Street
P.O. Box 25625
Overland Park, Kansas 66225-5626
Nature of Interest: Mechanics' lien claimant on property formally leased by Debtor, and Motion for Relief From Stay to pursue State Court mechanics' lien litigation. All claims or rights arose by virtue of the client's contractual, statutory, and/or common law rights with or against one or more of the Debtors.
- f. Premier Contracting, Inc.
c/o Duane Webb
Horn Aylward & Bandy, LLC
2600 Grand Blvd., Ste. 1100
Nature of Interest: Mechanics' lien claimant on property formally leased by Debtor, and Motion for Relief From Stay to pursue State Court mechanics' lien litigation. All claims or rights arose by virtue of the client's contractual, statutory, and/or common law rights with or against one or more of the Debtors.
- g. Lee County, Mississippi Tax Collector
c/o Leroy E. Belk, Jr.
Post Office Box 271
Tupelo, MS 38802
Nature of Interest: Rights and remedies in connection with tax claims asserted by Client. All claims or rights arose by virtue of the client's contractual, statutory, and/or common law rights with or against one or more of the Debtors.
- h. DeSoto County, Mississippi
Joey Treadway, Tax Collector
Administration Building
365 Loshier Street, Suite 110
Hernando, MS 38632
Nature of Interest: Rights and remedies in connection with tax claims asserted by Client. All claims or rights arose by virtue of the client's contractual, statutory, and/or common law rights with or against one or more of the Debtors.

3. The facts and circumstances relating to the employment of Sands, Anderson by the New Clients are that Sands Anderson serves as bankruptcy counsel to the New Clients to represent their interests in the Debtors' jointly-administered bankruptcy cases. The New Clients are billed monthly at the Sands Anderson's normal hourly rates for its shareholders, counsel, associates, and legal assistants for time spent and for costs incurred in providing legal services, pursuant to Sands, Anderson's standard terms and engagement.

4. Each of the New Clients has been advised of, and has consented to, Sands Anderson's representation of all other clients.

5. Sands Anderson reserves the right to supplement and/or amend this Statement at any time in the future.

Respectfully Submitted,

SANDS, ANDERSON, MARKS & MILLER, P.C.

/s/ William A. Gray
William A. Gray, Esquire – VSB #46911
C. Thomas Ebel, Esquire – VSB #18637
Peter M. Pearl, Esquire – VSB #22344
Ashley Burgess, Esquire – VSB # 67998
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Counsel for: Reverend Dwayne Funches, individually, and as Independent Executor of the Estates of Travis Funches, Dione Funches, and Dwayne Funches, Jr., Emily Funches, Lovera S. Funches, and Shatira Funches, individually; Cynthia Olloway, Individually and as a Special Administrator of the Estate of Cedric Coy Langston, Jr., a Deceased Minor; Monument Consulting, LLC; McAlister Square Partners, Ltd.; Mansfield SEQ 287 and Debbie, Ltd.; UTC I, LLC; PrattCenter, LLC; Valley Corners Shopping Center, LLC; Encinitas PFA, LLC; Cardinal Court, LLC; Phyllis M. Pearson; T.J. Maxx of CA, LLC; Baker Natick Promenade LLC; BPP-Conn LLC, f/k/a WEC 95B Manchester Limited Partnership; BPP Muncy, LLC; BPP-NY LLC; BPP-OH LLC; BPP-Redding LLC; BPP-SC LLC; The Stop & Shop Supermarket Company; BPP-VA LLC; BPP-WB

LLC; Colonial Heights Holdings, LLC; E&A Northeast Limited Partnership; Ray Mucci's, Inc.; Interstate Augusta, LLC; NPP Development, LLC; Route 146 Millbury, LLC; Alexander's of Rego Park Center, Inc.; Amherst VF LLC; BevCon I, LLC; Vornado Caguas LP; East Brunswick VF LLC; Green Acres Mall, LLC; Vornado Gun Hill Road LLC; Marlton VF, LLC; North Bergen Tonnelle Plaza, LLC; North Plainfield VF, LLC; Wayne VF LLC a/k/a/ Star Universal; Towson VF LLC; VNO Mundy Street LLC; VNO Tru Dale Mabry, LLC; Hilton Ellis Epps, Sr.; DEV Limited Partnership; Chatham County, Georgia Tax Commissioner; Christopher Borglin; Paul Schaapman; CSI Construction Company; Kelly Breitenbecher; A.D.D. Holdings, L.P.; Hillson Electric Incorporated; John Rohrer Contracting Company, Inc.; Lang Construction, Inc.; Rebecca Hylton DeCamps, Denon Electronics, Snell Acoustics, Inc.; Mid-American Insulation, Inc.; Midwest Block & Brick, Inc.; McCorkendale Construction; Premier Contracting, Inc.; Lee County, Mississippi Tax Collector; and DeSoto County, Mississippi

VERIFICATION

I, William A. Gray, an attorney with Sands Anderson Marks & Miller, P.C., after due inquiry declare under penalty of perjury, and pursuant to 28 U.S.C. § 1746, that the facts and representations set forth in this Verified Statement in accordance with Bankruptcy Rule 2019 are true and correct to the best of my knowledge and belief.

/s/ William A. Gray

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of July, 2009, a true and accurate copy of the foregoing was electronically filed with the Clerk of the Court for the Eastern District of Virginia, Richmond Division, using the CM/ECF system, which thereby caused the above to be served electronically on all registered users of the ECF system that have filed notices of appearance in this matter.

/s/ William A. Gray